

UNITED STATES OF AMERICA :

CRIMINAL NO: _____

v.

: DATE FILED: _____

CHRISTOPHER VENEZIALE

: VIOLATIONS:

18 U.S.C. §2119 (carjacking - 3 counts)

21 U.S.C. §844 (possession of cocaine

base (“crack”) - 1 count)

Notice of additional factors

COUNT ONE

On or about June 19, 2004, at Philadelphia, in the Eastern District of Pennsylvania, defendant

with intent to cause death and serious bodily harm, at knife point did take from the person and presence of another, by force and violence and by intimidation, a motor vehicle, that is, a 2001 Dodge Grand Caravan, Pennsylvania license number DLD3883, that had been transported, shipped and received in interstate and foreign commerce.

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COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

CHRISTOPHER VENEZIALE,

with intent to cause death and serious bodily harm, at knife point attempted to take from the
person and presence of another, by force and violence and by intimidation, a motor vehicle, that
is, a 2001 Chevy Cavalier, Pennsylvania license number EGL 3187, that had been transported,
shipped and received in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2119.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 20, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

CHRISTOPHER VENEZIALE,

with intent to cause death and serious bodily harm, at knife point attempted to take from the
person and presence of another, by force and violence and by intimidation, a motor vehicle, that
is, a 2003 Toyota Corolla. Pennsylvania license number FDA 1473, that had been transported,
shipped and received in interstate and foreign commerce.

In violation of Title 18, United States Code, Section 2119.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about June 19, 2004, at Philadelphia, in the Eastern District of
Pennsylvania, defendant

CHRISTOPHER VENEZIALE

knowingly and intentionally possessed a mixture or substance containing a detectable amount of
cocaine base (“crack”), a Schedule II drug controlled substance.

In violation of Title 21, United States Code, Section 844.

NOTICE OF ADDITIONAL FACTORS

THE GRAND JURY FURTHER CHARGES THAT:

1. In committing the offense charged in Count One of this indictment,
defendant **CHRISTOPHER VENEZIALE**:

- A. Committed an offense involving carjacking, as described in
U.S.S.G. § 2B3.1(b)(5).
- B. Committed an offense in which a threat of death was made, as
described in U.S.S.G. § 2B3.1(b)(2)(F).
- C. Committed an offense in which any person was abducted to
facilitate commission of the offense and to facilitate escape, as
described in U.S.S.G. § 2B3.1(b)(4)(A).
- D. Committed an offense in which a dangerous weapon was otherwise
used, as described in U.S.S.G. § 2B3.1(b)(2)(D).
- E. Committed an offense in which a dangerous weapon was
brandished and possessed, as described in U.S.S.G. §
2B3.1(b)(2)(E).

2. In committing the offense charged in Count Two of this indictment,
defendant **CHRISTOPHER VENEZIALE**:

- A. Committed an offense involving carjacking, as described in
U.S.S.G. § 2B3.1(b)(5).
- B. Committed an offense in which a threat of death was made, as
described in U.S.S.G. § 2B3.1(b)(2)(F).

- C. Committed an offense in which the victim sustained bodily injury, as described in U.S.S.G. § 2B3.1(b)(3)(A).
- D. Committed an offense in which a dangerous weapon was otherwise used, as described in U.S.S.G. § 2B3.1(b)(2)(D).
- E. Committed an offense in which a dangerous weapon was brandished and possessed, as described in U.S.S.G. § 2B3.1(b)(2)(E).

3. In committing the offense charged in Count Three of this indictment, defendant **CHRISTOPHER VENEZIALE**:

- A. Committed an offense involving carjacking, as described in U.S.S.G. § 2B3.1(b)(5).
- B. Committed an offense in which a threat of death was made, as described in U.S.S.G. § 2B3.1(b)(2)(F).
- C. Committed an offense in which a dangerous weapon was otherwise used, as described in U.S.S.G. § 2B3.1(b)(2)(D).

- D. Committed an offense in which a dangerous weapon was brandished and possessed, as described in U.S.S.G. § 2B3.1(b)(2)(E).

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney